

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2014-246-E

In re: Petition to Establish Generic)	
Proceeding Pursuant to the)	
Distributed Energy Resources)	
Program Act No. _____ of 2014,)	PETITION TO INTERVENE
Ratification No. 241)	
Senate Bill No. 1189)	
)	
)	

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, the “Conservation Groups”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. The South Carolina Coastal Conservation League (“CCL”) is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. The address of CCL’s main office is 328 East Bay Street, Charleston, SC 29402.

2. Southern Alliance for Clean Energy (“SACE”) is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy

resources to meet the South's energy needs. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

3. Pursuant to R. 103-804(S) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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4. The Commission opened this proceeding on the petition of the Office of Regulatory Staff filed pursuant to Section 58-40-20(F)(4) of the Distributed Energy Resources Program Act ("the Act"), which charged the Commission with conducting a generic proceeding "for the purposes of implementing the requirements of Chapter 40, Net Metering, which respect to the net energy metering rates, tariffs, charges and credits of electrical utilities, and specifically to establish the methodology to set any necessary charges and credits."

5. The Act directs that "all interested parties shall be allowed to participate" in the instant proceeding and "propose methodologies" for setting net metering rates and credits in the generic proceeding supported by an analysis and calculation of the relative benefits and costs of customer generation to the electrical utility, the customer-generators, and those customers of the electrical utility that are not customer-generators. S.C. Code Section 58-40-20(F)(4), (2)

6. In light of the above, the Conservation Groups have standing to intervene in the generic proceeding and represent the interests of their members. The Conservation Groups and their members have direct and substantial interests in the issues to be addressed and resolved by the Commission, and their interests cannot be adequately addressed by any other party. The Conservation Groups' involvement in these proceedings will promote the public interest by furthering the development of consistent and fair distributed generation policies among the state's electricity providers in the best interests of all South Carolinians. Therefore, the Conservation Groups seek to intervene in order to ensure that those interests are represented.

WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 28th day of July, 2014.

J. Blanding Holman IV *by JMB
w/ permission*
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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 28 day of July, 2014.



Jessica Foster, Legal Assistant